

ANTHONY J. PIRROTTI, JR., ESQ. (AJPJR0905)
PIRROTTI LAW FIRM LLC
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Attorneys for Plaintiff
(914) 723-4333
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL J. PIRZINGER,

Plaintiff,

- against -

Docket No.
10 CV 7245(BSJ)(KNF)

DEAN DIMITRIOU a/k/a DEAN DIMITRIOV,

Defendants.
-----X

NOTICE OF MOTION FOR REMAND

MOTION BY:

PIRROTTI LAW FIRM LLC
Attorneys for Plaintiff

ANSWERING PAPERS:

To be served within seven days (7) after
service of the moving papers pursuant to Local
Civil Rule 6.1

REPLY PAPERS:

Pursuant to Local Rule 6.1 of the U.S. District
Court for the Southern District of New York
within two (2) days after service of the
answering papers above.

PLACE OF HEARING:

At United States Court House, 500 Pearl
Street, Room 17C, New York, New York

SUPPORTING PAPERS: Attorney's Affidavit, sworn to the 19th day of October, 2010, Memorandum of Law with supporting documentation

RELIEF DEMANDED: An Order of the Court: (a) granting Plaintiff's instant Motion to Remand the case back to the Bronx County Supreme Court, (b) granting plaintiff costs, expenses and attorneys fees in the amount of NINE HUNDRED AND SEVENTY FIVE (\$975.00) DOLLARS, and (c) for such other and further relief as this Court deems just, suitable and proper.

EXHIBITS: Exhibit "A": Summons and Verified Complaint
Exhibit "B": Notice of Filing and Notice of Removal
Exhibit "C": Answer
Exhibit "D": Letter dated 10/13/10

Dated: Scarsdale, New York
October 19, 2010

PIRROTTI LAW FIRM LLC
By: 
ANTHONY PIRROTTI, JR. (AJP, JR 0905)
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TO: RUBIN, FIORELLA & FRIEDMAN LLP
Attorneys for Defendant and Third-Party Plaintiff
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